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Of Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

TRINKA A. TURNER, JUNE A. R.
MURPHY, and JENNIFER L. JUNKINS,
on behalf of themselves and all other
similarly situated,

Plaintiffs,

v.

THOMAS VILSACK, Secretary of the
Department of Agriculture;
DOUGLAS O'BRIEN, Acting
Undersecretary for Rural Development;
RICHARD DAVIS, Acting
Administrator Rural Housing Service;
and VICKI L. WALKER, Oregon RD
State Director,

Defendants.

Case No. 3:13-cv-01900 SI

PLAINTIFFS' MOTION FOR LEAVE
TO AMEND COMPLAINT

Pursuant to Fed. R. Civ. P. 15, Plaintiffs, by and through their undersigned counsel, move the Court for an order allowing them to amend their Complaint to:

1. Remove Richard Davis, former acting administrator as a defendant and to add the current Rural Housing Service administrator, Tony Hernandez;
2. Add additional factual allegations regarding funding for the property, an attempted purchase of the property, and Defendants' management of the property; and
3. Add an additional claim based on agency mismanagement of the property.

Pursuant to LR 7.1, Plaintiffs have made a good faith effort to resolve this dispute with Defendants, but have been unable to do so.

Pursuant to L.R. 15.1(d), a copy of the proposed amended complaint is attached hereto as Exhibit 1.

DATED this 14th day of January, 2014

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